

FINDING OF NO SIGNIFICANT IMPACT

Supplemental Programmatic Environmental Assessment for Army 2020 Force Structure Realignment



October 2014



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FINDING OF NO SIGNIFICANT IMPACT FOR ARMY 2020 FORCE STRUCTURE REALIGNMENT

October 2014

The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to consider potential environmental impacts prior to undertaking a course of action. NEPA is implemented through regulations promulgated by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] Parts 1500–1508) and within the United States (U.S.) Department of the Army (Army) by 32 CFR Part 651, *Environmental Analysis of Army Actions*. In accordance with these requirements, the Army has prepared a Supplemental Programmatic Environmental Assessment (SPEA), which is incorporated by reference, to consider environmental effects on installations that could result from implementation of the Proposed Action to realign Army forces from Fiscal Year (FY) 2013 through FY 2020. The SPEA was prepared to supplement the Army's 2013 Programmatic Environmental Assessment (PEA) due to changes to the Purpose and Need and the Proposed Action described in the previous document.

1.0 Title of the Action

Supplemental Programmatic Environmental Assessment for Army 2020 Force Structure Realignment.

2.0 Background Information

In 2013, to analyze the potential environmental and socioeconomic impacts associated with the initial realignment targets, the Army prepared a PEA titled *Programmatic Environmental Assessment for Army 2020 Force Structure Realignment* (2013 PEA). The 2013 PEA analyzed a proposed action consisting of a reduction in active Army end-strength from 562,000 to 490,000. While the 2013 PEA analyzed reductions beyond those required to reach an end-strength of 490,000, the 2013 PEA indicated that analyzing the numbers studied provided flexibility to decision makers over the ensuing years as conditions change, including fiscal, policy, and security considerations that were beyond Army control. In April 2013, a Finding of No Significant Impact (FNSI) was signed based on the 2013 PEA analysis.

As discussed in the 2013 PEA, the Army's proposed action (Army 2020 realignment) was to conduct force reductions and force realignments to a size and configuration that was capable of meeting national security and defense objectives, implement the 2010 Quadrennial Defense Review (QDR) recommendations, sustain unit equipment and training readiness, and preserve a high quality of life for active component Soldiers and their Families. The Army's civilian workforce would also be reduced. Army 2020 realignment also allowed for the adjustment of forces to meet requirements in high demand military occupational specialties, while rebalancing the number and types of units in lower priority military occupational specialties. Implementation

of Army 2020 realignment, as assessed in the 2013 PEA, enabled the Army to reduce its operational costs by maintaining a smaller force that still could meet the mission requirements of the then-current and future global security environment. Reductions and realignments were required to achieve the savings specified in the 2011 Budget Control Act. To achieve these savings, the Army proposed to reduce the size of its force from a post-9/11 peak of about 570,000 in 2010 to 490,000. In June 2013, the Army announced the inactivation of 10 Regular Army Brigade Combat Teams (BCTs) in the continental U.S. Five of these BCTs were inactivated in FY 2014, and five more will be inactivated in FY 2015. In addition to BCT reductions on U.S. installations, reductions were achieved through the elimination of Soldiers in temporary, wartime over-strength categories and the drawdown of overseas forces, the last of which reduced the impact of these force reductions on U.S. installations.

Since the 2013 PEA was completed, Department of Defense (DoD) fiscal guidance has continued to change, and the future end-strength of the Army must be reduced even further than the 490,000 considered in the 2013 PEA. This came about primarily because the second part of the 2011 Budget Control Act, commonly referred to as sequestration, came into effect. The 2014 QDR (supersedes the 2010 QDR in effect when the 2013 PEA was prepared) states that the active Army will reduce from its war-time high of 570,000 to 440,000–450,000 Soldiers. The 2014 QDR also states if sequestration-level cuts are imposed in FY 2016 and beyond, active component end-strength would need to be reduced to 420,000. These further potential reductions require a supplemental environmental and socioeconomic impact analysis of approximately two times the reductions analyzed in the 2013 PEA. In other words, the 2013 PEA analyzed reductions totaling approximately 72,000 (reducing the Army's end-strength from 562,000 to approximately 490,000); these new developments require analysis of further reductions of 70,000 (reducing the Army's end-strength from 490,000 to 420,000). As a result, the Army has prepared the SPEA, building on the information and analysis contained in the 2013 PEA, to assess the environmental and socioeconomic impacts of a substantial increase in potential reductions. This does not mean that these losses will actually occur to the full extent analyzed or even that each installation analyzed will incur losses. The Proposed Action for the SPEA is very similar to Alternative 1 in the 2013 PEA but is both broader in scope and allows for deeper potential reductions. The Army recognizes that cuts down to 420,000 Soldiers could have serious impacts to the installations and communities that host the Nation's force, and this document is intended to determine and disclose those impacts.

The SPEA analyzes the potential environmental and socioeconomic impacts associated with the reduction and realignment of the Army's force structure between FY 2013 and FY 2020 to a force best able to protect and advance U.S. interests and would sustain U.S. leadership within the fiscal constraints of decreased DoD funding. It should be noted that the SPEA is an analysis of the environmental and socioeconomic impacts of future Army force structure decisions. The SPEA is an analysis—not the force structure decision itself. The SPEA is just one input among many that will help inform Army senior leaders to make the force structure decisions described

in the Army's Proposed Action. The NEPA analysis, encompassing the SPEA and the public comments on the document, constitutes one of many elements in the force structure decision process. As it did in 2013, the Army's force structure decision process will again include community listening sessions at various locations across the country to afford the public an opportunity, outside of this NEPA process, to provide input on force structure decisions. The Army will consider both the environmental and socioeconomic impacts analyzed within the SPEA and the information provided by SPEA commenters, along with input from these listening sessions and a wide variety of other factors, as part of the overall force structure decision process.

In making these force structure decisions, the Army must consider how best to make trade-offs between programs and operations, while strategically moving forward to preserve mission capabilities and modernize the force to meet future threats. The SPEA presents an overarching perspective that provides decision makers, as well as regulatory agencies and the public, with information about the potential environmental and socioeconomic impacts, thereby enabling them to assess and compare those impacts. Decision makers will be able to take those impacts into consideration as they select where to reduce existing force structure or realign units.

3.0 Description of Proposed Action

The Army's Proposed Action is to reduce and realign its forces, both active component Soldiers and Army civilian employees, to best meet current and future national security and defense requirements within fiscal constraints as outlined in the 2014 QDR. The implementation of Army 2020 realignment with the resulting lower Army end-strength, as indicated in the 2014 QDR, will be necessary to operate on a reduced budget and maintain readiness in the remaining force.

4.0 Alternatives

In addition to the No Action Alternative, one action alternative has been formulated that considers the Army's needs for Army 2020 realignment.

Alternative 1—Implement Force Reductions

Under Alternative 1, the Army would reduce its end-strength to as low as 420,000 as indicated in the 2014 QDR (assuming sequestration-level cuts are resumed in FY 2016).¹ Table FNSI-1 presents the potential active component Soldier and Army civilian employee reductions that could occur at each of 30 locations considered under Alternative 1. These reductions are used as the maximum potential force reduction thresholds for each installation, thereby providing force structure decision makers with options as they select units and locations for reductions

¹ As noted in the SPEA, Section 1.2, the Bipartisan Budget Act of 2013 provided some relief from sequestration cuts, but these cuts are set to resume in FY 2016 unless Congress acts to stop them.

Table FNSI-1. Alternative 1—Force Reductions

Installation Name	Fiscal Year of Baseline Population	Baseline Permanent Party Soldier and Army Civilian Population ^a	Potential Population Loss Analyzed in the 2013 PEA	Potential Population Loss Analyzed in SPEA ^b	Lowest Potential Fiscal Year 2020 Baseline Permanent Party Soldier and Army Civilian Population
Aberdeen Proving Ground, Maryland	2013	12,335	--	4,300	8,035
Fort Belvoir, Virginia	2013	9,721	--	4,600	5,121
Fort Benning, Georgia	2011	17,501	7,100	10,800	6,701
Fort Bliss, Texas	2011	31,380	8,000	16,000	15,380
Fort Bragg, North Carolina	2011	52,975	8,000	16,000	36,975
Fort Campbell, Kentucky	2011	32,281	8,000	16,000	16,281
Fort Carson, Colorado	2011	25,702	8,000	16,000	9,702
Fort Drum, New York	2011	19,011	8,000	16,000	3,011
Fort Gordon, Georgia	2011	8,142	4,300	4,600	3,542
Fort Hood, Texas	2011	47,190	8,000	16,000	31,190
Fort Huachuca, Arizona	2013	5,841	--	2,700	3,141
Fort Irwin, California	2011	5,539	2,400	3,600	1,939
Fort Jackson, South Carolina	2013	5,735	--	3,100	2,635
Fort Knox, Kentucky	2011	13,127	3,800	7,600	5,527
Fort Leavenworth, Kansas	2013	5,004	--	2,500	2,504
Fort Lee, Virginia	2011	6,474	2,400	3,600	2,874
Fort Leonard Wood, Missouri	2011	9,161	3,900	5,400	3,761
Fort Meade, Maryland	2013	6,638	--	3,500	3,138

Installation Name	Fiscal Year of Baseline Population	Baseline Permanent Party Soldier and Army Civilian Population ^a	Potential Population Loss Analyzed in the 2013 PEA	Potential Population Loss Analyzed in SPEA ^b	Lowest Potential Fiscal Year 2020 Baseline Permanent Party Soldier and Army Civilian Population
Fort Polk, Louisiana	2011	10,836	5,300	6,500	4,336
Fort Riley, Kansas	2011	19,995	8,000	16,000	3,995
Fort Rucker, Alabama	2013	4,957	--	2,500	2,457
Fort Sill, Oklahoma	2011	11,337	4,700	6,800	4,537
Fort Stewart, Georgia	2011	18,647	8,000	16,000	2,647
Fort Wainwright, Alaska	2011	7,430	4,900	5,800	1,630
Joint Base Elmendorf-Richardson, Alaska	2011	6,861	4,300	5,300	1,561
Joint Base Langley-Eustis, Virginia	2011	7,382	2,700	4,200	3,182
Joint Base Lewis-McChord, Washington	2011	36,222	8,000	16,000	20,222
Joint Base San Antonio-Fort Sam Houston, Texas	2013	12,256	--	5,900	6,356
USAG Hawaii (Fort Shafter), Hawai'i	2013	7,431	--	3,800	3,631
USAG Hawaii (Schofield Barracks), Hawai'i	2011	18,441	8,000	16,000	2,441

Note: These reductions are used as the maximum potential force reduction thresholds for each installation, thereby providing force structure decision makers with options as they consider what best serves the Nation's defense prior to determining units and locations to be affected by reductions. As with the 2013 PEA, the total maximum potential reduction numbers presented in this table far exceed what is needed to meet the Proposed Action.

^a Populations include: Army military and Army civilians (excludes Army students and other military service personnel, contractors, and transients); population reduction numbers include full-time military and civilian employees only. Source of data is the Army Stationing Installation Plan (February 2012 for FY 2011 data and October 2013 for FY 2013 data). Where baseline populations differ from that in the 2013 PEA, differences represent corrections to data (e.g., removal of student populations because they are not part of the permanent party population). The population numbers do not include non-appropriated fund personnel.

^b Potential population losses to be analyzed in the SPEA are inclusive of the numbers previously analyzed in the 2013 PEA.

(for purposes of this analysis, unit refers to both Soldier and civilian personnel). The 30 locations were studied because they have the potential to lose 1,000 or more active component Soldiers and Army civilian employees. Twenty-one locations were analyzed for potential reductions in the 2013 PEA. The studied reductions for all 30 locations, if added together, would reduce the Army's active force to well below 400,000. Such deep reductions are not envisioned, but analyzing the highest potential reductions at each of the 30 locations will provide Army leaders flexibility in making future decisions about how and where to make cuts to reach the necessary end-strength as dictated by fiscal, policy, and strategic conditions.

The further reduction in active component Army Soldiers to 420,000, as indicated in the 2014 QDR, is approximately double that analyzed in the 2013 PEA (142,000, compared to 72,000) assuming the same baseline. For analysis in the SPEA, the Army generally is doubling the maximum reduction scenarios as presented in the 2013 PEA to achieve the increase in force reductions under current fiscal, policy, and strategic conditions. For each installation with two or more BCTs in FY 2012, the SPEA assumes the loss of two BCTs (approximately 3,450 Soldiers for Infantry BCTs; 3,850 for Armored BCTs; and 4,200 for Stryker BCTs), as well as 60 percent of the installation's non-BCT Soldiers and 30 percent of the Army civilian workforce. For installations with only one BCT, the SPEA assumes a loss of one BCT and 60 percent of the installation's non-BCT Soldiers and 30 percent of the Army civilian workforce. For installations with no BCTs, the SPEA assumes a loss of 70 percent of the installation's active component Soldiers and 30 percent of the Army civilian workforce. Because it is unlikely that any one installation would be selected to sustain a force reduction of more than 16,000 Soldiers and Army civilian employees, the potential reduction was capped at 16,000.

In addition, the Army may have to adjust force structure of the Reserve Component, and reduce Army Reserve and Army National Guard (ARNG) end-strength to complement active component force reductions. Those Reserve and ARNG changes are beyond the scope of the SPEA.

The Army is also aware that other branches of the military are experiencing their own budget cuts, and will be experiencing their own manpower and/or program reductions. Many of the installations in the SPEA are home to service members and civilian employees from the Air Force, Navy, or Marine Corps, in addition to the Army. The Army does not have specific information on the proposed reductions in military or civilian populations by these "sister services" at these locations. However, in general, their population numbers at the installations are relatively small, especially in comparison to the active Army; any possible future reductions by the "sister services" would not likely change the impact conclusions in the SPEA.

No Action Alternative

As described in the 2013 PEA, the No Action Alternative would retain the Army at a FY 2012 authorized end-strength of about 562,000 active component Soldiers and more than 320,000

Army civilians. The No Action Alternative generally assumes that units would remain where they were stationed at the end of FY 2012. Under the No Action Alternative, no additional Army personnel would be realigned or released from the Army to balance the composition of Army skill sets to match current and projected future mission requirements or to address budget requirements. No BCT restructuring would occur as proposed under Alternative 2 of the 2013 PEA, and no unit inactivations would occur.

While no longer realistic because force reductions and restructuring have occurred since FY 2011, which was the baseline year of populations extracted from the Army Stationing and Installation Plan (ASIP) data of February 2012, the inclusion of the No Action Alternative within the SPEA provides the same baseline as the PEA it supplements against which to compare the potential environmental and socioeconomic impacts of the Proposed Action and is required by CEQ regulations. Further, the No Action Alternative would require the Army to retain large numbers of units for which funding would be insufficient to maintain minimum readiness standards. The Army cannot deploy improperly trained Soldiers for dangerous missions.

5.0 Summary of Environmental Effects

The analysis of the potential environmental impacts is documented in the SPEA for Army 2020 realignment. Tables FNSI-2 and FNSI-3 provide a summary of impacts that are anticipated to result under the No Action Alternative and those that would result from implementing Alternative 1, respectively.

Additional Information

The Army received a considerable amount of information during the public comment period. Much of the information dealt with socioeconomic effects and indicated that the impacts of Alternative 1 would be worse than described in the SPEA. The Army took this into account in determining whether to reach this FNSI; however, if significant impacts were already determined in the SPEA in one or more of the socioeconomic categories (sales, income, employment, or population), as analyzed by the Economic Impact Forecast System (EIFS) model, the Army did not recalculate economic impacts based on this additional information to see whether the significance thresholds for the remaining categories were exceeded. An increase in the number of “significant” socioeconomic categories would not have affected the SPEA’s original overall significance rating or affect the FNSI. Because it is a NEPA document, the SPEA did not use an additional impact characterization of “extreme” or “severe” significance. Installation sections in the Annex have more detailed discussions.

Military Health Care System Review—DoD conducted an internal review of the Military Health System (MHS), referred to as the MHS Modernization Study. The Study was based on assessment of medical performance metrics and the need for appropriate levels of patient workload essential to sustainment of clinical skills and military medical readiness. The

review was not based on, and was independent of, the Army force reduction analysis in the SPEA. No force structure decisions have been made as a result of the Study.

The SPEA included a discussion of installation hospitals (when applicable) and the provision of medical services, both on- and off-post. The SPEA noted that demand for care at the facilities could decline if there were reductions in population under Alternative 1. This could, in turn, lead to an analysis of whether on-post health care facilities continue to be viable. While it is possible that patients may experience some additional inconvenience if health services needed to be accessed off-post, the Army is committed to ensuring that medical care requirements for Soldiers and their Families are met, regardless of whether an installation hospital or clinic were to be downsized.

It is possible some on-post health services jobs could be lost if the Army were to reduce the provision of on-post health services, but such jobs could also move to off-post providers, which would experience an increase in demand. As stated above, the Army is committed to ensuring that the necessary health services are available for their Soldiers and their Families, whether provided on-post or found in the community.

If an installation force structure is reduced, the Army will review the need for medical services and the best way of meeting those needs.

Errata—The comments also revealed a consistent mistake in the SPEA. In the last paragraph of each installation cumulative impacts discussion in Chapter 4, the SPEA refers to “the loss of approximately [XXX] Soldiers....” This number, however, represents the approximate number of Soldiers *and* civilian positions that could be lost. This FNSI takes the correct number into account.

Population Decline—Commenters also noted that the SPEA assumed for purposes of estimating population decline that all Soldiers, Army civilian employees, and Family members would leave the area if the position to which they are connected were eliminated. At least some of these people would choose to remain in the area, and this means that the population loss could be overestimated. There is no way to estimate the percentage of affected people who would remain in the regions affected, so the SPEA made a conservative assumption that all would leave. There were only three installations for which population was the only socioeconomic factor with a significant rating: Aberdeen Proving Ground, Fort Lee, and Fort Rucker. The overall socioeconomic significance rating for these installations will be kept with the assumptions on population loss taken into account.

Review of Beneficial Impacts

One commenter raised the question of whether there were any significant, beneficial impacts that would require preparation of an environmental impact statement (EIS). Table FNSI-3 indicates that every installation would have some beneficial impacts under the action alternative. Table 4

of the FNSI for the 2013 PEA, which the SPEA supplements, made a similar finding for Alternative 1. Neither analysis made a determination of whether any of these beneficial impacts would be significant. The Army therefore reviewed the beneficial impacts identified in the SPEA and determined that none of the beneficial impacts would be significant and that their cumulative beneficial impact also would not be significant. In part, this is because operations that cause environmental impacts at installations are expected to continue, even under the maximum numbers identified in Alternative 1. Given this, an EIS is not required on this basis.

Impacts Anticipated as a Result of the Implementation of Alternative 1

Alternative 1 would involve the reduction of active component Soldiers and Army civilians to achieve an active component end-strength of 420,000 Soldiers by reducing those forces at the 30 locations shown in Table FNSI-1. The valued environmental components (VECs) and impacts are:

Air Quality: There would be a beneficial impact to regional air quality from reduced stationary and mobile emission sources at all installations considered under this alternative. There would be less combustion and generation of air pollutants for which there are National Ambient Air Quality Standards (e.g., ozone, sulfur byproducts, lead) and hazardous air pollutants associated with military training. Long-term effects from implementation of Alternative 1 would include a decrease in stationary source emissions, such as from boiler units and by units using transportable generators during training operations. Fewer privately owned and fleet vehicles would decrease air pollutants (e.g., carbon monoxide and ozone) because there would be less traffic on and off installations; however, for installations in, near, or within reasonable commuting distance to more urban areas, many of those vehicles would likely still be traveling within the same airshed. A net reduction in greenhouse gases (GHGs) and fossil fuel use would occur.

Airspace: No increases in airspace designations would be required to implement Alternative 1. Some beneficial impacts to the National Airspace System may occur because there would be less frequent activation of Special Use Airspace (SUA) to support training activities.

Cultural Resources: Alternative 1 would result in a reduction of training activities at installations, which would reduce the risk of impacts on cultural resources. Installations would continue to manage cultural resources in accordance with applicable legal requirements. Before any action with the potential to affect an eligible or potentially eligible resource, the State Historic Preservation Officer would be consulted under Section 106 of the National Historic Preservation Act, as required, or under existing agreements.

Under Alternative 1, Fort Wainwright, Joint Base Elmendorf-Richardson, and U.S. Army Garrison (USAG) Hawaii (including both Fort Shafter and Schofield Barracks) identified the potential for significant but mitigable impacts to cultural resources. The effects of this alternative

are similar to those analyzed in the No Action Alternative—the reduction of forces would not alter the existing conditions at these installations, which are analyzed under the No Action Alternative.

Noise: There would be a beneficial impact from a reduced frequency of training. Fewer weapons firing and less training and maneuver activity would generally reduce nuisance noise impacts, resulting in beneficial impacts to overall noise levels. Some installations would continue to experience adverse, although reduced, noise impacts from ongoing mission activities, but those would be less than significant.

Soils: There would be a beneficial impact from reduced frequency of training. Less firing and maneuver activity would reduce soil disturbances for a beneficial impact.

Biological Resources: There could be some beneficial, long-term impacts to biological resources (e.g., vegetation and wildlife) from reduced training activities. In this case, less firing and maneuver activities would reduce biological resource impacts. There would be no significant impacts to threatened and endangered species anticipated because installations would continue to be able to implement conservation plans and measures in support of listed species.

Wetlands: Beneficial to minor, adverse impacts to wetlands are anticipated because of reduced training activities.

Water Resources: Negligible to minor impacts to surface water and groundwater are anticipated at all installations due to reduced sedimentation, disturbance, or spills from training and testing activities. Application of best management practices would ensure that pollutants are properly handled and disposed of, and that any hazardous waste does not enter ground or surface waters. Water demand and treatment requirements would decrease for a beneficial impact at most installations.

Facilities: Overall, minor, adverse impacts to facilities are anticipated at all installations. Personnel reductions associated with Alternative 1 would reduce requirements for facilities and affect space utilization across all installations. Depending on the missions associated with the population reductions at a given installation, the facility effects would either create additional excess capacity or shrink existing capacity shortfalls. Occupants of older, underutilized, or excess facilities may be moved to newer facilities; in some cases this could require modification of existing facilities. Construction projects that had been programmed in the future may not occur or could be down-scoped. Force reductions would reduce the Army's demand for utilities and housing units; therefore, the government could incur costs for not meeting any guaranteed minimum quantities required by existing privatization agreements. While excess facility capacity would be created in the aggregate across the Army's installations, as noted in Section 1.3 of the SPEA, reductions that could result in underutilization of training areas and facilities to the point

that these training areas and facilities would become excess is not reasonably foreseeable at this time for purposes of NEPA.

Socioeconomics: The level of significance was determined by the EIFS model, which produces thresholds for assessing the significance of impacts based on deviations relative to historical averages. The EIFS model evaluates changes in sales, income, employment, and population. A summary of these potential impacts is provided in Table FNSI-4. If the EIFS model predicted one or more of these indicators as significant, the overall rating for socioeconomics was determined to be significant (Table FNSI-3).

The Army has maintained, updated, and used the EIFS model for the past 20 years. The EIFS model assesses potential impacts to the four most critical elements of the local economy: sales, income, employment, and population. The EIFS model draws information from a tailored database for every county in the U.S., and that database extracts data from the best sources available, including the Economic Censuses (wholesale, retail, services, and manufacturers), Census of Agriculture, the Bureau of Economic Analysis employment and income time series, the Bureau of Economic Analysis labor force time series, and the County Business Patterns.

There could be significant, adverse impacts to the regional economies of a number of installations. Significant, adverse regional economic impacts from force reduction, in terms of sales, employment, regional population, and/or income are anticipated at Aberdeen Proving Ground, Fort Benning, Fort Bliss, Fort Bragg, Fort Carson, Fort Campbell, Fort Drum, Fort Gordon, Fort Hood, Fort Huachuca, Fort Jackson, Fort Knox, Fort Leavenworth, Fort Lee, Fort Leonard Wood, Fort Polk, Fort Riley, Fort Rucker, Fort Sill, Fort Stewart, Fort Wainwright, Joint Base Elmendorf-Richardson, Joint Base Langley-Eustis, Joint Base Lewis-McChord, and USAG Hawaii. Less than significant economic impacts would occur in Regions of Influence (ROIs) with more diversified economies at Fort Belvoir, Fort Irwin, Fort Meade, and Joint Base San Antonio-Fort Sam Houston.

Under Alternative 1, no environmental justice issues are expected because there would not be disproportionately high or adverse human health, safety, or environmental effects on minority or low-income populations or children.

Energy Demand and Generation: Beneficial impacts are anticipated at all installations because installation and regional energy demands would decrease.

Land Use Conflict and Compatibility: Beneficial impacts could occur as a result of reduced training activities and an associated decrease in the use of land for training. Depending on the installation, this could reduce adverse impacts associated with incompatible uses with areas surrounding the installation, reduce the impacts of installation noise on surrounding land uses, or allow for more use of installation land for recreational activities in lieu of training activities.

Hazardous Materials and Hazardous Waste: Negligible to less than significant impacts would result. Remediation activities are not expected to be affected by the reduced numbers of Soldiers and support personnel. It is expected that the potential for spills would be reduced during training and maintenance activities. Waste collection, storage, and disposal processes would remain mostly unchanged, although the quantities are expected to be reduced. Violations of hazardous waste regulations or hazardous waste permits are not anticipated to increase as a result of force reductions.

Traffic and Transportation: Beneficial impacts are anticipated because traffic would decrease on and off the installations. Delays at access points would decrease at some installations during morning and evening peak traffic hours. At certain installations such as Fort Belvoir, Fort Bragg, Fort Meade, Joint Base Elmendorf-Richardson, Joint Base Lewis-McChord, and USAG Hawaii, traffic back-ups from main gate access points to federal and state highways may be reduced during peak traffic hours.

Table FNSI-2. Potential Environmental Impacts of the No Action Alternative

Installation Name	Valued Environmental Component													
	Air Quality	Airspace	Cultural Resources	Noise	Soils	Biological Resources	Wetlands	Water Resources	Facilities	Socio-economics	Energy Demand and Generation	Land Use Conflicts and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Aberdeen Proving Ground	M	N	M	M	M	M	M	M	N	B	M	M	M	M
Fort Belvoir	M	N	N	N	M	N	N	M	N	B	M	M	M	LS
Fort Benning	M	M	M	LS	LS	LS	LS	LS	M	B	M	LS	M	M
Fort Bliss	M	M	N	N	M	N	N	M	N	B	N	M	M	SM
Fort Bragg	M	M	N	M	SM	N	M	N	N	B	M	N	N	SM
Fort Campbell	M	N	N	N	M	N	N	M	N	B	N	N	N	N
Fort Carson	LS	N	N	N	LS	N	M	M	M	B	N	N	M	LS
Fort Drum	M	N	M	N	N	M	M	N	N	B	M	N	N	M
Fort Gordon	M	N	N	N	N	N	N	N	LS	B	N	SM	N	N
Fort Hood	M	N	N	N	M	M	N	M	N	B	N	N	N	N
Fort Huachuca	M	N	M	M	M	M	M	M	N	B	M	M	M	N
Fort Irwin	M	N	M	N	M	M	N	LS	M	B	N	M	M	M
Fort Jackson	M	N	N	N	M	M	M	M	N	B	M	M	M	N
Fort Knox	M	N	N	N	M	N	N	M	N	B	N	N	N	N
Fort Leavenworth	M	N	M	N	M	M	N	M	N	B	M	N	M	M
Fort Lee	M	N	M	N	N	N	N	N	N	B	N	N	N	N
Fort Leonard Wood	M	N	N	N	N	N	N	N	N	B	N	N	N	N
Fort Meade	M	N	N	N	N	N	N	N	N	B	M	N	M	M
Fort Polk	N	N	N	N	M	N	N	N	N	B	N	N	N	N
Fort Riley	M	N	N	N	M	N	N	M	N	B	N	N	N	N
Fort Rucker	M	N	N	LS	M	N	M	M	N	B	M	LS	M	LS
Fort Sill	M	N	N	SM	N	N	N	N	N	B	N	N	N	M
Fort Stewart	M	N	N	N	M	N	M	M	N	B	N	N	N	M
Fort Wainwright	M	M	SM	M	M	M	M	M	N	B	N	N	N	M
Joint Base Elmendorf-Richardson	LS	N	SM	M	LS	SM	LS	M	M	B	M	M	LS	LS
Joint Base Langley-Eustis	M	N	M	N	N	M	M	N	M	B	M	N	M	LS
Joint Base Lewis-McChord	LS	S	LS	S	N	LS	N	LS	LS	B	N	M	M	S
Joint Base San Antonio-Fort Sam Houston	M	N	M	N	M	N	M	M	N	B	M	N	M	N
USAG Hawaii—Schofield Barracks and Fort Shafter	N-M	M	M-SM	LS-SM	N-SM	N-SM	M	M	N-M	B	N	N	M	N

Notes: B – beneficial, N – negligible/no impact, M – minor, LS – less than significant, SM – significant but mitigable, S – significant

Table FNSI-3. Potential Environmental Impacts of Alternative 1—Implement Force Reductions

Installation Name	Valued Environmental Component													
	Air Quality	Airspace	Cultural Resources	Noise	Soils	Biological Resources	Wetlands	Water Resources	Facilities	Socio-economics	Energy Demand and Generation	Land Use Conflicts and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Aberdeen Proving Ground	B	N	M	M	B	B	B	B	M	S	B	M	M	B
Fort Belvoir	B	B	M	N	B	B	B	B	M	LS	B	N	M	B
Fort Benning	B	N	M	M	B	B	N	M	M	S	B	M	B	B
Fort Bliss	B	M	M	B	B	B	B	B	M	S	B	M	M	B
Fort Bragg	B	M	M	B	B	B	B	B	M	S	B	N	M	B
Fort Campbell	B	N	N	B	B	N	N	B	M	S	B	N	N	B
Fort Carson	B	B	B	B	B	B	B	B	M	S	B	N	B	B
Fort Drum	B	N	M	N	B	M	B	N	M	S	B	N	N	B
Fort Gordon	B	N	N	B	N	N	N	N	M	S	B	B	N	B
Fort Hood	B	B	M	B	B	B	N	B	M	S	B	N	N	B
Fort Huachuca	B	B	M	B	B	B	B	M	M	S	B	M	M	B
Fort Irwin	B	B	B	B	B	B	N	B	M	LS	B	M	M	M
Fort Jackson	B	B	N	B	B	B	B	B	M	S	B	B	M	B
Fort Knox	B	N	M	B	B	N	N	B	M	S	B	N	M	B
Fort Leavenworth	B	N	M	B	B	B	B	B	M	S	B	N	M	B
Fort Lee	B	N	M	B	N	N	N	N	M	S	B	B	M	B
Fort Leonard Wood	B	N	M	N	N	N	N	N	M	S	B	N	M	B
Fort Meade	B	N	N	N	N	N	N	N	M	LS	B	N	M	B
Fort Polk	B	N	N	N	N	N	B	B	M	S	B	N	M	B
Fort Riley	B	N	M	B	N	B	N	B	M	S	B	N	M	B
Fort Rucker	B	N	N	B	B	B	B	B	M	S	B	B	M	B
Fort Sill	B	N	M	B	N	N	N	B	M	S	B	B	LS	B
Fort Stewart	B	N	M	B	N	B	B	B	M	S	B	B	M	B
Fort Wainwright	B	B	SM	B	N	M	M	M	M	S	B	B	N	B
Joint Base Elmendorf-Richardson	B	B	SM	B	M	M	B	B	M	S	B	M	LS	B
Joint Base Langley-Eustis	B	N	M	B	B	M	B	N	M	S	B	N	M	B
Joint Base Lewis-McChord	B	N	M	B	N	B	N	B	M	S	B	B	LS	B
Joint Base San Antonio-Fort Sam Houston	B	N	M	B	B	B	B	B	M	LS	B	N	M	B
USAG Hawaii—Schofield Barracks and Fort Shafter	B	B	M-SM	B	B	B	M-B	M-B	M	S	B	B	M	B

Notes: B – beneficial, N – negligible/no impact, M – minor, LS – less than significant, SM – significant but mitigable, S – significant

Table FNSI-4. Potential Socioeconomic Impacts of Alternative 1—Implement Force Reductions

Installation	Sales	Income	Employment	Population
Aberdeen Proving Ground	LS	LS	LS	S
Fort Belvoir	LS	LS	LS	LS
Fort Benning	LS	LS	LS	S
Fort Bliss	LS	LS	S	S
Fort Bragg	LS	LS	S	S
Fort Campbell	LS	LS	S	S
Fort Carson	LS	LS	S	S
Fort Drum	S	S	S	S
Fort Gordon	LS	LS	LS	S
Fort Hood	LS	LS	S	S
Fort Huachuca	LS	LS	S	S
Fort Irwin	LS	LS	LS	LS
Fort Jackson	LS	LS	LS	S
Fort Knox	LS	S	S	S
Fort Leavenworth	S	S	S	S
Fort Lee	LS	LS	LS	S
Fort Leonard Wood	LS	S	S	S
Fort Meade	LS	LS	LS	LS
Fort Polk	LS	S	S	S
Fort Riley	S	S	S	S
Fort Rucker	LS	LS	LS	S
Fort Sill	S	S	S	S
Fort Stewart	S	S	S	S
Fort Wainwright	LS	LS	S	S
Joint Base Elmendorf-Richardson	LS	LS	S	S
Joint Base Langley-Eustis	LS	LS	S	S
Joint Base Lewis-McChord	LS	LS	LS	S
Joint Base San Antonio-Fort Sam Houston	LS	LS	LS	LS
USAG Hawaii—Schofield Barracks and Fort Shafter	LS	LS	S	S

Notes: LS – less than significant, S – significant

6.0 Public Comments

The draft FNSI and SPEA were made available for public review on June 26, 2014, when a Notice of Availability (NOA) was published in the *Federal Register*. Although the Army's NEPA regulations only require a 30-day public comment period, the public comment period for the draft FNSI and SPEA was 60 days. The Army received more than 111,000 public comments. Commenters constituted a broad spectrum of people, businesses, organizations, and institutions. In addition to members of the public, the Army received comments from members of Congress, state and local officials, Tribal governments, regulators, other government officials, special interest groups and non-profit organizations, civic groups, public service organizations, academia, and private businesses. The Army sincerely thanks the many commenters whose detailed submissions provide greater perspective to Army decision makers as they work through the process to make these difficult force structure determinations.

Attached is an Annex that provides a more detailed summary of comments received, to include installation-specific comments and responses. The following paragraphs provide an overview of a number of the comments received during the public review period and the Army's responses.

The majority of the public's comments focused on socioeconomic impacts. Many commenters expressed concern that the Army may have underestimated potential negative socioeconomic impacts for the regions surrounding a number of the installations analyzed for force reductions under Alternative 1. Some commenters provided detailed criticisms of the Army's EIFS model and suggested corrections. Economic impact assessments based on other models that produced different results were submitted for the regions encompassing Fort Drum, Fort Huachuca, Fort Jackson, Fort Polk, Fort Wainwright, and Joint Base Lewis-McChord. The Army appreciates this input and the effort involved to provide additional information.

The SPEA concluded that force reductions would result in significant socioeconomic impacts for all but four installations (Table FNSI-3). The comments indicated that, in many cases, economic impacts could be more adverse than described in the SPEA. In the SPEA, as with all NEPA analyses, "significant" is the highest possible qualitative rating; there are no varying degrees of significance. The Army has concluded that these comments, suggested corrections, and proposed re-calculations of the socioeconomic analysis contained in the SPEA would not change the SPEA's overall conclusion regarding the significance of the potential socioeconomic impact for any of the analyzed installations. They also would not change the conclusion that less than significant economic impacts would occur in ROIs with more diversified economies at Fort Belvoir, Fort Irwin, Fort Meade, and Joint Base San Antonio-Fort Sam Houston. Even though no impact ratings were changed, all of the public comments and additional information will be made part of the administrative record and will be carefully considered prior to making force structure decisions.

Nearly all of the commenters expressed concern about the socioeconomic impact of force reductions on communities surrounding the assessed Army installations. Although commenters were concerned about impacts on many different elements of their local economies, the concerns raised by most commenters related to schools and health care services and facilities. The loss of tax base and federal aid supporting these programs and facilities, staff reductions, the potential for school and hospital closings, and increased emergency medical response times were frequently stated. As noted in Section 5.0 of this FNSI, the Army determined that the regional economies of a number of installations could experience significant, adverse impacts. The Army acknowledges that some school districts may need to re-evaluate staffing plans for schools that could lose Soldier- and Army civilian-related students as part of their student populations. The Army also acknowledges that these impacts have the potential to significantly affect individuals and families who live and/or work in the affected communities.

The issue of potential impacts to the health care of Soldiers, their Families, and other beneficiaries was also expressed as a concern. The Army acknowledges that reductions in medical inpatient capabilities may impact convenience; however, access to quality health care would be available in the local community.

Many commenters expressed concern about investments on installations and in communities surrounding those installations. The DoD and Army made substantial investments on some installations to accommodate Army growth needed as a result of increased overseas combat operations and to implement the Base Realignment and Closure (BRAC) 2005 decisions and other major stationing actions. State, local, and private investments made to support the Army generally included off-post infrastructure improvement, school system expansion, health care service and medical facility improvement, business development, and various other efforts in support of the installation and its Soldiers and Families. Some commenters conveyed concerns about public financing obligations for off-post infrastructure undertaken by local communities to support these increased populations. Commenters expressed concern about impacts that may result if utility infrastructure is underutilized (e.g., wastewater treatment plants), buildings and residences are underutilized or vacant, recently expanded businesses and other organizations lose a substantial portion of their client base, and loan payment and bond payoff capabilities are reduced or lost as a result of lower revenue streams. These commenters pointed out those financial obligations would continue, even though force reductions could mean a reduced tax base and less need for these investments. The Army acknowledges the substantial investments made by many communities in support of their local installations. The Army is now faced with a set of difficult decisions and will carefully consider this community input, along with other factors, prior to making final force structure decisions.

Many commenters highlighted the close relationship between the Army or joint base installations analyzed in the SPEA and the surrounding communities. The Army acknowledges and

appreciates the relationship between installation leadership, staff, and military Families and the surrounding communities.

Many commenters expressed confusion about the Army's force structure decision process and how the SPEA fits into that process. The force structure decision process and its relationship to this analysis are generally described in Section 1.6 of the SPEA. The NEPA analysis, encompassing the SPEA and the public comments on the document, constitutes one of many elements in the force structure decision process. The NEPA analysis focuses on analyzing and disclosing the environmental and socioeconomic impacts associated with the proposed force reductions. As it did in 2013, the Army's force structure decision process will again include community listening sessions at various locations across the country to afford the public an opportunity, outside of this NEPA process, to provide input on force structure decisions. The Army will consider both the environmental and socioeconomic impacts analyzed within the SPEA and the information provided by SPEA commenters, along with input from these listening sessions and a wide variety of other factors, as part of the overall force structure decision process. Army leadership will carefully consider all of these inputs prior to making final force structure decisions.

Many commenters expressed concern about the risk to U.S. security and the Army's ability to conduct its mission, including readiness for contingencies abroad and the quality of Soldier training, after force structure decisions are made and end-strength is reduced. As explained in Section 2.0 of this FNSI, the Proposed Action represents the Army's effort to meet the intent of the 2014 QDR, which is focused on rebalancing the force to protect U.S. interests during a period of increasing fiscal constraint brought on by the Budget Control Act of 2011 and the sequestration process it imposed. The 2014 QDR demands that the Army meet its national security mission with reduced levels of funding and personnel. It also highlights the risk that sequestration-level cuts pose to the DoD's ability to project power and win decisively in future conflicts. It is important to remember that the SPEA looks at the environmental and socioeconomic impacts associated with any potential reductions; consideration of security and readiness impacts will be part of the force structure and mission analysis. The critical factor in making force structure decisions is how the Army can be shaped to meet mission requirements in an era of reduced appropriations.

Many commenters stated that the proposed force reductions were not the result of any reduction in the level of threat to the U.S., but merely the result of required budget cuts under sequestration. They were against any reductions. As explained in Section 1.2 of the SPEA, the Budget Control Act of 2011 instituted both a 10-year, \$487 billion cut in spending and an additional sequestration mechanism requiring additional cuts of about \$50 billion annually. Many other cost reduction measures have been implemented, but budget cuts of this magnitude compel the Army to reduce its force. In addition, force reductions are necessary to rebalance the Joint Force. Threats to the U.S. change continually over time. While there has been a drawdown

of forces required for combat operations in Iraq and Afghanistan, new challenges like the renewed conflict in Iraq and Syria and the Ebola virus situation in West Africa have arisen. Force structure decisions must consider both current and future world conditions.

Any proposed reductions of active component Army forces below 490,000 are based on fiscal realities. Failing to reduce the size of the force under the current and projected budget caps will put the Army out of balance—readiness and modernization would have to be reduced to such an extent that it would result in unacceptable risks to accomplishment of Army missions.

Some commenters raised issues about the NEPA process itself. Concerns cited included the limited number of alternatives analyzed in the SPEA (e.g., not including an alternative reduction to 440,000 to 450,000), the selection of the installations analyzed, the lack of significant environmental impacts, and the decision not to prepare an EIS in spite of potentially significant socioeconomic impacts. The SPEA supplements the previous 2013 PEA and incorporates that existing analysis, while adding additional analysis. The Army did not analyze a reduction alternative of 440,000 to 450,000 Soldiers as a separate alternative because that reduction scenario would have provided little additional environmental and socioeconomic information. The socioeconomic model used by the Army in both the 2013 PEA and the 2014 SPEA is generally linear and scalable for the range of population reductions assessed. Reductions that are less than the reduction analyzed for a given installation will translate into proportionately lower socioeconomic impacts.

Moreover, the reductions will be made on a unit or organizational basis at individual installations. The SPEA analyzes the impacts associated with maximum anticipated reductions at each installation included in the assessment; this analysis will support an unrestricted number of potential decisions, all different permutations of reductions at any of the 30 installations analyzed. The Army now has before it a complete suite of options for which the environmental and socioeconomic consequences have been analyzed for each installation. The SPEA analysis would be the same, regardless of the ultimate endpoint of the Army-wide drawdown.

The 1,000 Soldier/Army civilian threshold for determining which installations were analyzed represents a level of reduction at a majority of installations that warrants analysis at the programmatic level, represents a number that Army planners thought could potentially produce significant impacts, and is a threshold established by Congress in 10 U.S.C. §993 for reporting of planned reductions of members of the Armed Forces at military installations.

Some commenters identified as potentially significant certain second-order impacts that could occur as a result of force reductions (such as underuse of training areas, facilities, or housing). As noted in Section 1.3 of the SPEA, these impacts are too speculative to be analyzed prior to force reduction decisions and therefore are outside of the scope of the SPEA, but could be the subject of future, site-specific, follow-on NEPA analysis, as applicable and appropriate. The Army will continue to implement required environmental compliance obligations and meet

health and safety requirements. The Army will also monitor the impacts of reductions on its environmental programs and will make staffing adjustments as necessary to ensure that these cuts do not adversely affect the Army's compliance with environmental requirements.

Although the SPEA concludes there would be significant socioeconomic impacts resulting from the proposed force reductions for most of the installations analyzed, CEQ regulation 40 CFR 1508.14 states that significant socioeconomic impacts alone do not require the preparation of an EIS. Nevertheless, the SPEA provides the same socioeconomic modeling and level of detailed analysis that the Army would present in an EIS.

The Army received some general comments that the SPEA process was legally insufficient and not prepared in accordance with NEPA regulations. These comments raised issues such as whether the SPEA took a hard look at the impacts; whether the SPEA examined reasonable alternatives to the Proposed Action; whether the SPEA examined the cumulative effects of the Proposed Action; and whether the conclusion is arbitrary and capricious. The Army reviewed these issues, which are addressed more fully in the FNSI Annex. The Army determined that the SPEA was prepared in accordance with applicable NEPA regulations and that it is sufficient to serve as a basis for the FNSI.

Although some comments raised environmental concerns that were highly detailed and installation-specific, the Army received no significant new information relevant to environmental concerns and bearing on the Proposed Action or its impact that would require revision or supplementation of the SPEA. Consequently, the Army concludes, based on the SPEA, that socioeconomic impacts would be significant for all but four of the installations analyzed, as noted in Table FNSI-3, and that environmental impacts for all other VECs would be less than significant as a consequence of Alternative 1—Implement Force Reductions.

7.0 Conclusion

Based on a careful review of the SPEA, which is incorporated by reference, I have concluded that no significant environmental impacts, other than socioeconomic impacts, are anticipated to result from the implementation of the Proposed Action under the alternative analyzed. Therefore, an EIS is not required. Environmental impacts associated with the implementation of the Proposed Action could occur to air quality, airspace, cultural resources, noise, soils, biological resources, wetlands, water resources, facilities, socioeconomics, energy demand, land use, hazardous materials and waste, and traffic and transportation. Beneficial impacts could occur to some resource areas, but these would not be significant. Significant but mitigable impacts could occur under the Proposed Action to cultural resources, but measures to reduce impacts to less than significant are currently in place and would continue under the Proposed Action. After force structure decisions are made, it is possible that additional site-specific NEPA analyses would be conducted, as appropriate, to implement the decisions.

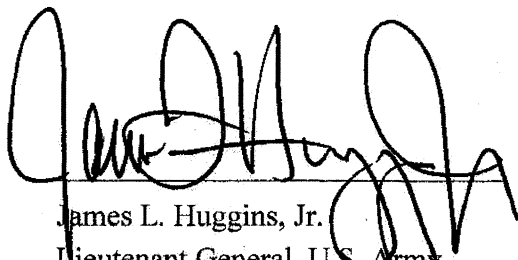
The SPEA has identified that socioeconomic impacts could be significant at many installations. These impacts are of particular concern to the Army. CEQ and Army regulations state that economic or social impacts are not intended by themselves to require preparation of an EIS. Therefore, in accordance with these federal regulations, the Army is not preparing an EIS. Even though an EIS will not be prepared, the SPEA contains a comprehensive analysis of the socioeconomic impacts, which will be carefully considered before final force structure decisions are made.

The Army has not completed the decision process for unit realignment and inactivations. The information in the SPEA will be used to support a series of decisions in the coming years regarding how the force is to be realigned. As discussed above, and in Section 1.6 of the SPEA, those decisions will be made based on mission-related criteria and other factors, in addition to potential environmental and socioeconomic impacts identified in the SPEA and any future environmental analysis needed to support Army realignment decisions.

The Army sincerely appreciates the participation of the public in the SPEA. All of the public's comments will be made a part of the administrative record and will be carefully considered by the Army prior to making final force structure decisions covered under this analysis.

Please see the attached Annex for a more detailed summary of comments received, to include installation-specific comments.

An NOA of this FNSI will be placed in the *Federal Register*. Requests for further information concerning this FNSI and the SPEA should be sent to: U.S. Army Environmental Command, ATTN: Public Affairs Office, 2450 Connell Road (Building 2264), Joint Base San Antonio-Fort Sam Houston, TX 78234-7664 or emailed to usarmy.jbsa.aec.nepa@mail.mil.



James L. Huggins, Jr.
Lieutenant General, U.S. Army
Deputy Chief of Staff, G-3/5/7

10 NOV 2014

Date